

## REMARKS

This Amendment and the following remarks are being submitted with an RCE and are intended to fully respond to the Final Office Action mailed December 19, 2005. In that Office Action, claims 1-6 and 8-20 were examined, and all claims were rejected. Specifically, claims 1-6 and 8-20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Hafsteinsson et al. (US Patent App. Pub No. 2004072484A1). Reconsideration of these rejections, as they might apply to the original and amended claims in view of these remarks, is respectfully requested.

In this Response, no claims are being amended; claim 20 is being canceled; and claim 21 is being added. Claims 1-6, 8-19 and 21 are present for examination.

### **Claim Rejections - 35 U.S.C. § 103**

Claims 1-6 and 8-20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Hafsteinsson et al. (U.S. Patent App. Pub. No. 2004072484A1), hereinafter "Hafsteinsson." Applicants respectfully submit that the Examiner has not established a *prima facie* case of obviousness with respect to the currently pending claims, because he has not cited prior art references that teach all the elements of the claims.

As argued in the previous response, the portions of Hafsteinsson cited by the Examiner to reject claims 1-6 and 8-20 are not entitled to the priority date of the provisional application (60/194,695) from which it claims priority. As previously stated, there is nothing in the provisional indicating that a capability of a device is ever determined. Moreover, because the provisional indicates that a request already contains the specific transformation to use for conversion of the data, there is no need to determine a capability of the device, much less use the determined capability of a device to retrieve information about an adapter set. Accordingly, the subject matter of Hafsteinsson cited by the Examiner to reject the claims of the present application is not entitled to the priority date of the provisional, and consequently is not prior art.

For at least this reason, the Applicants respectfully submit that the Examiner has failed to establish a *prima facie* case of obviousness with respect to independent claims 1, 8, and 14, because the Examiner has failed to cite prior art references that disclose all the elements of the

claims. Claims 2-3, 5-6, 9-10, 12-13, and 15-19 are each dependent upon one of claims 1, 8, and 14, and are allowable for at least the same reasons.

New claim 21 recites limitations similar to claim 1 and is therefore allowable for at least the same reasons as claim 1. Furthermore, claim 21 recites “wherein an adapter set is applicable if an adapter within the adapter set or one of the adapter’s ancestors maps to a control identified by the information,” which is language similar to claim 11. In rejecting claim 11, the Examiner did not specifically point out any portion of Hafsteinsson that teaches any feature akin to adapter’s ancestors, as recited in new claim 21. Applicants respectfully submit that the reason for this is that Hafsteinsson fails to teach or suggest any feature akin to adapter’s ancestors. The Examiner equates the conversion and selection rules disclosed by Hafsteinsson to adapters. *See Final Office Action* (December 19, 2005), page 3. However, Hafsteinsson makes no mention of the conversion or selection rules having ancestors (e.g., related parent classes), and thus does not teach or suggest this limitation. Moreover, Hafsteinsson does not teach or suggest that the applicability of an adapter set to a capability of a device is determined based on whether an adapter or an adapter’s ancestor maps to a control. Indeed, Hafsteinsson makes no mention of controls at all, nor that any of the conversion or selection rules (which the Examiner equates to adapters) are mapped to any information that is analogous to controls.

For these additional reasons, Applicants submit that the Examiner has not established a *prima facie* case of obviousness with respect to new claim 21.

**Conclusion**

This Amendment fully responds to the Final Office Action mailed December 19, 2005. Still, that Office Action may contain arguments and rejections that are not directly addressed by this Amendment due to the fact that they are rendered moot in light of the preceding arguments in favor of patentability. Hence, failure of this Amendment to directly address an argument raised in the Office Action should not be taken as an indication that the Applicant believes the argument has merit. Furthermore, the claims of the present application may include other elements, not discussed in this Amendment, which are not shown, taught, or otherwise suggested by the art of record. Accordingly, the preceding arguments in favor of patentability are advanced without prejudice to other bases of patentability.

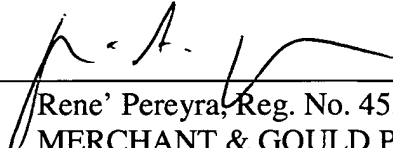
It is believed that no fees are due with this Response. However, the Commissioner is hereby authorized to charge any deficiencies or credit any overpayment with respect to this patent application to deposit account number 13-2725.

In light of the above remarks and amendments, it is believed that the application is now in condition for allowance and such action is respectfully requested. Should any additional issues need to be resolved, the Examiner is requested to telephone the undersigned to attempt to resolve those issues.

Respectfully submitted,

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